

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	X	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO,	:	(Jointly Administered)
<i>et al.</i> ,	:	
	:	
Debtors. ¹	:	
	:	
	X	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	
	:	Case No. 17-BK-04780-LTS
PUERTO RICO ELECTRICAL POWER	:	
AUTHORITY (PREPA),	:	Court Filing Relates Only to PREPA
	:	
Debtor.	:	
	X	

**[PROPOSED] ORDER GRANTING URGENT MOTION OF SOLUS
TO COMPEL PRODUCTION OF DOCUMENTS BY U.S. BANK**

The Debtors in these title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Upon consideration of the *Urgent Motion of Solus to Compel Production of Documents by U.S. Bank* (the “Motion”),² filed on July 23, 2019, and it appearing that (i) the Court has subject matter jurisdiction over this Motion pursuant to 28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); (ii) venue of this proceeding and the Motion is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); (iii) notice of the Motion was adequate and proper under the circumstances and no further or other notice need be given; (iv) any objections to the Motion either being resolved or overruled by this Court after due consideration; and after due deliberation and sufficient cause appearing therefor, the Court concludes that SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD, and Ultra NB LLC have satisfied the requirements for an order compelling the production of documents pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, made applicable to these proceedings by Rules 7026 and 7037 of the Federal Rules of Bankruptcy Procedure and 48 U.S.C. § 2170,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED to the extent set forth herein.
2. U.S. Bank, National Association (“U.S. Bank”) shall, no later than August ___, 2019, produce all non-privileged documents responsive to Request No. 4 of the *First Set of Document Requests of Cortland Capital Market Services LLC, as Administrative Agent, and Solus Alternative Asset Management LP to U.S. Bank, National Association, As Bond Trustee* as set forth in the Motion.
3. U.S. Bank’s failure to produce documents responsive to the *First Set of Document Requests of Cortland Capital Market Services LLC, as Administrative Agent, and*

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Solus Alternative Asset Management LP to U.S. Bank, National Association, As Bond Trustee
precludes U.S. Bank and the Bondholders from advancing any arguments or submitting any
evidence regarding the “Current Expense” status of the Fuel Lines or the payment rights of the
Fuel Lines in relation to PREPA’s Bondholders at or in advance of the hearing on the Settlement
Motion.

Dated _____, 2019

Honorable Judith G. Dein
United States Magistrate Judge